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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master No.: 3:07-CV-05944-JST
MDL No. 1917

This Document Relates to:

ALL INDIRECT-PURCHASER ACTIONS

**DECLARATION OF LAUREN C.
CAPURRO IN SUPPORT OF
INDIRECT-PURCHASER
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL PURSUANT TO CIVIL
LOCAL RULES 7-11 AND 79-5(d)**

1 I, Lauren C. Capurro, declare:

2 1. I am an attorney duly licensed by the State of California and am admitted to
3 practice before this Court. I am a partner at the law firm Trump, Alioto, Trump & Prescott,
4 LLP and my firm serves as Lead Counsel for the Indirect Purchaser Plaintiffs (“IPPs”) in
5 the above-captioned action.

6 2. I make this declaration in support of the IPPs’ Administrative Motion to
7 File Under Seal Pursuant to Civ. L. R. 7-11 and 79-5(d). The matters set forth herein are
8 within my personal knowledge and if called upon and sworn as a witness I could
9 competently testify regarding them.

10 3. I have reviewed and complied with this Court’s Standing Order Governing
11 Administrative Motions to File Materials Under Seal Before District Judge Jon S. Tigar,
12 dated March 19, 2019.

13 4. I have reviewed and complied with Civil Local Rule 79-5.

14 5. On June 18, 2008, the Court approved a “Stipulated Protective Order” in
15 this matter (ECF. No. 306, amended at ECF No. 1142) (the “Protective Order”).

16 6. Section 10 of the Protective Order requires that “a Party may not file in the
17 public record in this action any Protected Material. A Party that seeks to file under seal any
18 Protected Material must comply with Civil Local Rule 79-5.”

19 7. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d), IPPs
20 seek to file the following documents, or portions thereof, under seal:

21 a. Gray highlighted portions of IPPs’ Opposition to the Irico Defendants’
22 Amended Motions to Dismiss Claims of IPPs for Lack of Subject
23 Matter Jurisdiction;

24 b. Gray highlighted portions of the Declaration of Mario N. Alioto In
25 Support of IPPs’ Opposition to the Irico Defendants’ Amended Motions
26 to Dismiss Claims of IPPs for Lack of Subject Matter Jurisdiction (the
27 “Alioto Declaration”); and
28

c. Exhibits 2, 5-11, 13-17, 19-25, 27-36, and 39 to the Alioto Declaration.

8. The documents or portions of documents that IPPs seek to file under seal contain either (a) material designated by the Irico Defendants or other parties to this litigation pursuant to the Stipulated Protective Order as “Confidential” or “Highly Confidential” or (b) analysis of, references to, or information taken directly from material designated by the Irico Defendants or other parties to this litigation pursuant to the Stipulated Protective Order as “Confidential” or “Highly Confidential.”

9. The documents or portions thereof identified in Paragraph 3 have been designated as confidential or highly confidential by the entities identified in the table below.

No	Document	Designating Entity
1	Gray highlighted portions of IPPs’ Opposition to the Irico Defendants’ Amended Motions to Dismiss Claims of IPPs for Lack of Subject Matter Jurisdiction	Irico Defendants; Defendants Beijing Matsushita Color CRT Co. Ltd., Chunghwa Picture Tubes, Ltd., Samsung SDI, MT Picture Display Co., Ltd., and Koninklijke Philips Electronics N.V.; and BestBuy
2	Gray highlighted portions of the Alioto Declaration	Irico Defendants; Defendants Beijing Matsushita Color CRT Co. Ltd., Chunghwa Picture Tubes, Ltd., Samsung SDI, MT Picture Display Co., Ltd., and Koninklijke Philips Electronics N.V.; and BestBuy
3	Exhibit 2 to the Alioto Declaration bearing the Bates stamp BMCC-CRT-000105538-57 and a translation of an excerpt thereof	Defendant Beijing Matsushita Color CRT Co. Ltd.
4	Exhibit 5 to the Alioto Declaration: excerpts of the transcript of the deposition of Zhang Wenkai on March 4, 2019	Irico Defendants
5	Exhibit 6 to the Alioto Declaration: excerpts of the transcript of the deposition of Zhang Wenkai on March 5, 2019	Irico Defendants

6	Exhibit 7 to the Alioto Declaration: experts of the transcript of the deposition of Wang Zhaojie on March 6, 2019	Irico Defendants
7	Exhibit 8 to the Alioto Declaration: experts of the transcript of the deposition of Wang Zhaojie on March 7, 2019	Irico Defendants
8	Exhibit 9 to the Alioto Declaration: experts of the transcript of the deposition of Wang Zhaojie on March 8, 2019	Irico Defendants
9	Exhibit 10 to the Alioto Declaration: Irico Defendants' Supplemental Objections and Responses to IPPs' Second Set of Interrogatories, dated November 2, 2018	Irico Defendants
10	Exhibit 11 to the Alioto Declaration: Irico Defendants' Corrected Supplemental Objections and Responses to IPPs' Second Set of Interrogatories, dated April 11, 2019	Irico Defendants
11	Exhibit 13 to the Alioto Declaration bearing the Bates stamp IRI-CRT-00003570-71 and a translation of IRI-CRT-00003570	Irico Defendants
12	Exhibit 14 to the Alioto Declaration bearing the Bates stamp IRI-CRT-00003584-85 and a translation of IRI-CRT-00003584	Irico Defendants
13	Exhibit 15 to the Alioto Declaration bearing the Bates stamp IRI-CRT-00003586-87 and a translation of IRI-CRT-00003586	Irico Defendants
14	Exhibit 16 to the Alioto Declaration bearing the Bates stamp IRI-CRT-00003588-89 and a translation of IRI-CRT-00003588	Irico Defendants
15	Exhibit 17 to the Alioto Declaration bearing the Bates stamp IRI-CRT-00003594-95 and a translation of IRI-CRT-00003594	Irico Defendants
16	Exhibit 19 to the Alioto Declaration bearing the Bates stamp CHU00690421 and a translation thereof	Defendant Chunghwa Picture Tubes, Ltd.
17	Exhibit 20 to the Alioto Declaration bearing the Bates stamp SDCRT-0202827 and a translation thereof	Defendant Samsung SDI
18	Exhibit 21 to the Alioto Declaration bearing the Bates stamp MTPD-0573273 and a translation thereof	Defendant MT Picture Display Co., Ltd.
19	Exhibit 22 to the Alioto Declaration bearing the Bates stamp PHLP-CRT-	Defendant Koninklijke Philips Electronics

	010948	N.V. (“Philips”)
20	Exhibit 23 to the Alioto Declaration bearing the Bates stamp CHU00029191-94 and a translation thereof	Defendant Chunghwa Picture Tubes, Ltd
21	Exhibit 24 to the Alioto Declaration bearing the Bates stamp PHLP-CRT-154896-898	Philips
22	Exhibit 25 to the Alioto Declaration bearing the Bates stamp PHLP-CRT-155234-36	Philips
23	Exhibit 27 to the Alioto Declaration bearing the Bates stamp BBYCRT053101	BestBuy
24	Exhibit 28 to the Alioto Declaration bearing the Bates stamp CHU00124396-99 and CHU00124400-02 and a translation thereof	Defendant Chunghwa Picture Tubes, Ltd.
25	Exhibit 29 to the Alioto Declaration bearing the Bates stamp MTPD-0523073-79 and a translation thereof	Defendant MT Picture Display Co., Ltd.
26	Exhibit 30 to the Alioto Declaration bearing the Bates stamp CHU00572096 and 2098 and a translation thereof; and CHU00572996, 2998, 3026 and 3034 and a translation thereof	Defendant Chunghwa Picture Tubes, Ltd.
27	Exhibit 31 to the Alioto Declaration bearing the Bates stamp PHLP-CRT-172663-67	Philips
28	Exhibit 32 to the Alioto Declaration bearing the Bates stamp CHU00124417-19, and a translation thereof	Defendant Chunghwa Picture Tubes, Ltd.
29	Exhibit 33 to the Alioto Declaration bearing the Bates stamp CHU00689067-69, and a translation thereof	Defendant Chunghwa Picture Tubes, Ltd.
30	Exhibit 34 to the Alioto Declaration: excerpts of the Deposition of Chunghwa’s Chih Chun (C.C.) Liu	Defendant Chunghwa Picture Tubes, Ltd.
31	Exhibit 35 to the Alioto Declaration bearing Bates stamp IRI-CRT-00000487 and a translation thereof	Irico Defendants
32	Exhibit 36 to the Alioto Declaration: excerpts of the transcript of the deposition of Donald Clarke on March 26, 2019 ¹	Irico Defendants

¹ The Irico Defendants have thirty (30) days to designate the deposition transcript as “Confidential” or “Highly Confidential” under the terms of the protective order [ECF No. 306]. In an abundance of caution, IPPs have included this transcript in the sealing motion although the Irico Defendants have not yet designated it “Confidential” or “Highly Confidential.” The thirty (30) day period has not yet expired.

33	Exhibit 39 to the Alioto Declaration: Irico Defendants' Third Supplemental Objections and Responses to IPPs' First Set of Requests for Production of Documents, dated January 18, 2019	Irico Defendants
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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 12th day of April, 2019 at San Francisco, California.

/s/ Lauren C. Capurro

Lauren C. Capurro